

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

Erin Wilson, individually and on behalf  
of all others similarly situated,

Plaintiff,

v.

Grocery Delivery E-Services  
USA Inc. d/b/a EveryPlate,

Defendant.

Case No. 1:25-cv-03262-VMC

**DEFENDANT’S RULE 7.1 CERTIFICATE OF INTERESTED PERSONS  
AND CORPORATE DISCLOSURE STATEMENT**

Pursuant to Federal Rule of Civil Procedure 7.1 and Local Rule 3.3, Defendant Grocery Delivery E-Services USA Inc. d/b/a EveryPlate hereby states the following:

1. The undersigned counsel of record for Defendant certifies that the following is a full and complete list of all parties in this action, including any parent corporation and any publicly held corporation that owns 10% or more of the stock of a party:

- a. Plaintiff:** Erin Wilson, an individual.
- b. Defendant:** Grocery Delivery E-Services USA Inc. d/b/a EveryPlate, a non-governmental corporate party, discloses that its parent corporation is HelloFresh SE. HelloFresh SE does not

have a parent corporation, and no publicly held corporation owns 10% or more of HelloFresh SE's stock.

2. The undersigned further certifies that the following is a full and complete list of all other persons, associations, firms, partnerships, or corporations having either a financial interest in or other interest which could be substantially affected by the outcome of this case:

- HelloFresh SE

3. The undersigned further certifies that the following is a full and complete list of all persons serving as attorneys for the parties in this case:

**a. Plaintiff:**

- i. Anthony I. Paronich, Paronich Law, P.C.
- ii. Valerie Lorraine Chinn, Chinn Law Firm, LLC

**b. Defendant:**

- i. Ari N. Rothman, Venable LLP
- ii. Shahin O. Rothermel, Venable LLP
- iii. Michael A. Caplan, Caplan Cobb LLC
- iv. Jarred A. Klorfein, Caplan Cobb LLC

*[signature on following page]*

Respectfully submitted this 5th day of September, 2025.

/s/ Jarred A. Klorfein

Michael A. Caplan

Georgia Bar No. 601039

Jarred A. Klorfein

Georgia Bar No. 562965

**CAPLAN COBB LLC**

75 Fourteenth Street, NE, Suite 2700

Atlanta, Georgia 30309

Tel: (404) 596-5600

Fax: (404) 596-5604

mcaplan@caplancobb.com

jklorfein@caplancobb.com

Ari N. Rothman (*pro hac vice*)

Shahin O. Rothermel (*pro hac vice*

*forthcoming*)

**VENABLE LLP**

600 Massachusetts Avenue, NW

Washington, DC 20001

Tel: (202) 344-4000

Fax: (202) 344-8300

anrothman@venable.com

sorothermel@venable.com

*Counsel for Defendant*

*Grocery Delivery E-Services USA Inc.*

*d/b/a EveryPlate*

**CERTIFICATE OF SERVICE**

I hereby certify that, on this day, I caused a true and correct copy of the foregoing document to be filed with the clerk's office using this Court's CM/ECF system, which will automatically send notice of such filing to all counsel of record.

This 5th day of September, 2025.

/s/ Jarred A. Klorfein  
Jarred A. Klorfein  
Georgia Bar No. 562965

*Counsel for Defendant*  
*Grocery Delivery E-Services USA Inc.*  
*d/b/a EveryPlate*